

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

JULIO ROCHA,

Plaintiff,

v.

CERTAIN UNDERWRITERS AT LLOYD'S,  
LONDON; AXIS SPECIALTY EUROPE SE,

Defendants.

Civil Action No.: **1:16-CV-02327**

**DECLARATION OF ALEXANDER  
D. HARDIMAN IN OPPOSITION  
TO DEFENDANTS' MOTION TO  
DISMISS**

I, ALEXANDER D. HARDIMAN, being duly sworn, deposes and says:

1. I am a partner in the law firm of Pillsbury Winthrop Shaw Pittman LLP, counsel for Plaintiff Julio Rocha. I submit this Declaration in Support of Plaintiff Julio Rocha's Motion for Preliminary Injunction Requiring Defendants to Pay Defense Costs.

2. Attached hereto as **Exhibit A** is a true and complete copy of the November 24, 2015 Superseding Indictment filed against fourteen individual defendants, including Julio Rocha.

3. Attached hereto as **Exhibit B** is a true and complete copy of Appendix 1, to the Employment Agreement between Mr. Rocha and Fédération Internationale de Football Association ("FIFA"), dated December 27, 2012.

4. Attached hereto as **Exhibit C** is a true and complete copy of the Transcript of the Civil Cause for Order to Show Cause, dated June 21, 2016.

5. Attached hereto as **Exhibit D** is a December 16, 2015 letter from Baudacci Nigg Stenberg to Mr. Rocha's U.S. coverage counsel.

6. Attached hereto as **Exhibit E** is a true and complete copy of this Court's April 27, 2016 Memorandum & Order in the related case of Eduardo Li v. Certain Underwriters at Lloyd's, London, et al., Case No. 15-CV-06099 (RJD).

7. Attached hereto as **Exhibit F** is a true and complete copy of "Nine FIFA Officials and Five Corporate Executives Indicted for Racketeering Conspiracy and Corruption," DEPARTMENT OF JUSTICE, *available at* <https://www.justice.gov/opa/pr/nine-fifa-officials-and-five-corporate-executives-indicted-racketeering-conspiracy-and> (May 27, 2016).

Dated: August 5, 2016

Respectfully submitted,

/s/ Alexander D. Hardiman

Alexander D. Hardiman